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Attorneys for Plaintiffs  
CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

CORY SPENCER, an individual;  
DIANA MILENA REED, an  
individual; and COASTAL  
PROTECTION RANGERS, INC., a  
California non-profit public benefit

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF SAMANTHA  
WOLFF IN SUPPORT OF  
PLAINTIFFS' EX PARTE  
APPLICATION**

1 corporation,

2 Plaintiffs,

3 v.

4 LUNADA BAY BOYS; THE  
5 INDIVIDUAL MEMBERS OF THE  
6 LUNADA BAY BOYS, including but  
7 not limited to SANG LEE, BRANT  
8 BLAKEMAN, ALAN JOHNSTON  
9 AKA JALIAN JOHNSTON,  
10 MICHAEL RAE PAPAYANS,  
11 ANGELO FERRARA, FRANK  
12 FERRARA, CHARLIE FERRARA,  
13 and N. F.; CITY OF PALOS VERDES  
ESTATES; CHIEF OF POLICE JEFF  
KEPLEY, in his representative  
capacity; and DOES 1-10,

14 Defendants.

Complaint Filed: March 29, 2016  
Trial Date: December 12, 2017

15  
16 I, Samantha Wolff, declare as follows:

17 1. I am a partner with the law firm Hanson Bridgett LLP, counsel of  
18 record in this matter for Plaintiffs Cory Spencer, Diana Milena Reed, and the  
19 Coastal Protection Rangers, Inc. ("Plaintiffs"). I have personal knowledge of the  
20 matters set forth in this declaration and could and would competently testify to  
21 them. All of the matters stated here are known to me personally, unless stated on  
22 information and belief; and with regard to those statements, I am informed and  
23 reasonably believe them to be true.

24 2. On October 12, 2017, I appeared before the Honorable Magistrate  
25 Judge Rozella Oliver at a hearing on Plaintiffs' motion for sanctions against  
26 Defendants Sang Lee, Charlie Ferrara, and Frank Ferrara. A true and correct copy  
27 of the transcript from the October 12, 2017 hearing is attached as **Exhibit 1**.

28 ///

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed on November 7, 2017, at Los Angeles, California.

4  
5 /s/ Samantha D. Wolff  
6 Samantha D. Wolff  
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